

EXHIBIT A-1

Date	Hours	Description	Rate (\$)	Billable (\$)	User
4/8/2023	0.4	Drafted preliminary defense strategy and timeline based on input from Jake Hutchinson	\$400	\$160	Matthew Harris
4/9/2023	0.8	Analyzed/evaluated VCE internal Report No. 22-363 regarding Jason Pirtle's engineering/investigation report and findings prepared for John Price and Shelter Insurance	\$400	\$320	Matthew Harris
4/9/2023	0.4	Reviewed Plaintiff's First Amended Complaint excluding exhibits regarding analysis of preliminary defenses	\$400	\$160	Matthew Harris
4/9/2023	0.9	Reviewed Exhibit Nos 1-8 relied upon in Plaintiff's First Amended Complaint including select excerpts from property damage insurance policy with endorsements, and Plaintiff's counsel's comments/edits incorporated into Mr. Pirtle's report	\$400	\$360	Matthew Harris
4/9/2023	0.3	Evaluated property card records, VCE administrative documentation, and invoice documentation generated by VCE for Shelter Insurance during preparation for inspection of Mrs. Plunk's property loss causation	\$400	\$120	Matthew Harris
4/10/2023	0.3	Drafted a Notice of Appearance in preparation for filing with the court	\$150	\$45	Adelle Hammarsten
4/10/2023	0.2	Began drafting Answer to the Complaint in preparation for filing with the court	\$150	\$30	Adelle Hammarsten
4/10/2023	0.1	Finalized correspondence to Mr. Hutchinson regarding approach and next steps	\$150	\$15	Adelle Hammarsten
4/12/2023	0.1	Continued drafting Notice of Appearance	\$475	\$47.5	Thomas Shumate
4/12/2023	0.3	Organized information and file materials for attorney review and reference in litigation	\$150	\$45	Sydney Brumbach
4/12/2023	0.2	Drafted correspondence to the Madison County Circuit Court Clerk's office regarding filing the Notice of Appearance	\$150	\$30	Mikayla Joyner
4/12/2023	0.3	Drafted correspondence to opposing counsel regarding filing of the Notice of Appearance	\$150	\$45	Mikayla Joyner
4/10/2023	0.6	Draft correspondence to VCE regarding confirmation of initial defense strategy	\$400	\$240	Matthew Harris
4/13/2023	0.4	Draft Motion for Additional Time to File Responsive Pleading	\$400	\$160	Matthew Harris
4/13/2023	0.3	Draft Agreed Order Granting VCE's Motion for Additional Time to File Responsive Pleading	\$400	\$120	Matthew Harris
4/13/2023	0.2	Draft correspondence to Drayton Berkley regarding request for extension of time to file responsive pleading and intent to discuss and confirm certain factual allegations made in the Complaint	\$400	\$80	Matthew Harris
4/13/2023	0.3	Research local rules and Tenn. Rules of Civil Procedure re threshold requirements for entry of order extending deadline for Answer, Defenses, Rule 12 Motions	\$400	\$120	Matthew Harris

EXHIBIT A-1

4/13/2023	0.6	Review docket proceedings for the United States District Court of West Tennessee regarding removal from state to federal court; initial corporate disclosure filing statement required by local rules; Notice of Removal pleading and Shelter Insurance's position that all claims fall under insurance statute	\$400	\$240	Matthew Harris
4/17/2023	0.5	Updated the Motion for Extension of Time to File Responsive Pleading and Proposed Agreed Order in preparation for filing in the Western District of Tennessee	\$150	\$75	Mikayla Joyner
4/17/2023	0.2	Drafted a Notice of Appearance for Matthew Harris for VCE, Inc. in the Western District of Tennessee	\$150	\$30	Mikayla Joyner
4/17/2023	0.2	Drafted a Notice of Appearance for Tom Shumate for VCE, Inc. in the Western District of Tennessee	\$150	\$30	Mikayla Joyner
4/18/2023	0.4	Reviewed the Western District of Tennessee local rules and identified the process for filing Proposed Orders using the Judge's ECF mailbox in preparation for filing the Proposed Order Granting updated Motion for Extension of Time to File Response	\$150	\$60	Mikayla Joyner
4/18/2023	0.4	Finalized Updated Motion for Extension to File Responsive Pleading in preparation for filing with the Court	\$150	\$60	Mikayla Joyner
4/18/2023	0.2	Updated and finalized Proposed Agreed Order Granting Motion for Extension in preparation for filing with the Court	\$150	\$30	Mikayla Joyner
4/18/2023	0.3	Drafted correspondence to opposing counsel and Jason Pirtle regarding the updated Motion for Extension of Time to File Responsive Pleading, Certificate of Consultation and Proposed Agreed Order	\$150	\$45	Mikayla Joyner
4/18/2023	0.4	Obtained and organized Western District of Tennessee filings in preparation for attorney review	\$150	\$60	Mikayla Joyner
4/14/2023	0.4	Teleconference with Jason Campbell as counsel for Shelter Insurance regarding tentative agreement to extend VCE's deadline to respond	\$400	\$160	Matthew Harris
4/11/2023	0.6	Evaluate and annotate 34 pages of documents produced by VCE in response to previous correspondence including email exchanges between VCE and Mr. Pirtle	\$400	\$240	Matthew Harris
4/13/2023	0.2	Draft/exchange correspondence with Drayton Berkley regarding request for extension to file responsive pleading; Plaintiff's tentative approval of same; notification that matter now removed to federal court	\$400	\$80	Matthew Harris
4/14/2023	0.6	Research viability of Shelter's argument in support of removal to federal court based on citizenship of parties and amount in controversy; Shelter's argument that client improperly joined to defeat 1332(a) jurisdiction	\$400	\$240	Matthew Harris
4/19/2023	0.3	Updated the Corporate Disclosure Statement with stock holder information in preparation for filing with the Court	\$150	\$45	Mikayla Joyner

EXHIBIT A-1

4/17/2023	0.1	Drafted correspondence to opposing counsel regarding filing the Notice of Appearance and Motion for Extension of Time to File Responsive Pleading	\$150	\$15	Mikayla Joyner
4/18/2023	0.3	Updated and finalized Certificate of Consultation in preparation for filing with the Court	\$150	\$45	Mikayla Joyner
4/18/2023	0.1	Review entered Order granting VCE's Motion for Extension of Time to File Responsive Pleading	400	\$40	Matthew Harris
4/19/2023	0.3	Research Federal Rule Civil Procedure 7.1 and 7.2 re specific content requirements for corporate disclosure statement	\$150	\$45	Matthew Harris
4/19/2023	0.2	Draft/exchange correspondence to VCE regarding request for phone call, summary of federal court removal, position on preliminary defense strategy and anticipated steps forward	\$400	\$80	Matthew Harris
4/19/2023	0.5	Teleconference with Jake Hutchinson and Wade Hutchinson regarding status update as to order extending deadlines, position on federal court removal, [REDACTED] [REDACTED] [REDACTED] [REDACTED]	\$400	\$200	Matthew Harris
4/20/2023	0.2	Draft correspondence to Nhataly Vu regarding follow-up on [REDACTED] updated/abbreviated status information	\$400	\$80	Matthew Harris
4/21/2023	0.1	Drafted correspondence to Jason Pirtle's counsel requesting a copy of his Motion for Extension of Time to Respond to Complaint which was filed under seal	\$150	\$15	Mikayla Joyner
4/20/2023	0.4	Review/evaluate Shelter Insurance's Motion to Dismiss including memorandum brief outlining statutory authority and prior case precedent on Counts I-III in Plaintiff's Complaint for Umpire and Breach of Contract	\$400	\$160	Matthew Harris
5/9/2023	0.4	Review/evaluate correspondence [REDACTED] [REDACTED] provided by Mr. Pirtle to VCE [REDACTED] [REDACTED] [REDACTED]	\$150	\$60	Matthew Harris
5/2/2023	1.3	Research applicability of Tennessee insurance statutes and authorities regarding potential motion to dismiss select claims asserted in Plaintiff's Complaint	\$400	\$520	Matthew Harris
5/15/2023	0.6	Review/annotate Plaintiff's Motion to Remand, Memorandum of Authority supporting same, and Plaintiff's Proposed Order submitted to Court in event relief is granted	\$400	\$240	Matthew Harris
5/15/2023	0.3	Participated in telephone conference with Jake Hutchison regarding Motion to Dismiss	\$150	\$45	Mikayla Joyner
5/15/2023	0.3	Teleconference with Jake and Wade Hutchinson regarding strategy shift and intent to proceed with motion to dismiss, [REDACTED] [REDACTED]	\$400	\$120	Matthew Harris
5/15/2023	0.1	Review Order of Reference from district court judge to magistrate court judge	\$400	\$40	Matthew Harris

EXHIBIT A-1

5/15/2023	0.4	Reviewed notes from previous correspondence exchanged with QBE and CNA insurance carriers in preparation for drafting correspondence to Cindy Chitwood with update on case and potential dispositive motion	\$400	\$160	Matthew Harris
5/16/2023	1.5	Finalize research regarding application of Fed. Rule Civil Procedure 12(b)(6) to claim for implied negligence without specific reference to same; inapplicability of insurance statute to VCE as matter of law; case authority and precedent from West Tenn. District Court and Tenn. Appellate Courts in preparation to draft Motion to Dismiss all claims with prejudice	\$400	\$600	Matthew Harris
5/16/2023	0.3	Draft correspondence to Beth Woodard and Cindy Chitwood regarding position as to [REDACTED] and request for information as made available	\$400	\$120	Matthew Harris
5/19/2023	0.5	Review email correspondence exchanged between John Price and VCE's administrative staff; communication between Mr. Pirtle and John Price; VCE internal administrative controls in place for Plunk project; select excerpts from Plaintiff's exhibits 55-89 to the Complaint	\$400	\$200	Matthew Harris
5/19/2023	0.2	Reviewed Western District of TN Local Rules regarding Motions to Dismiss to ensure compliance in preparation for filing with the Court	\$150	\$30	Mikayla Joyner
5/19/2023	0.9	Updated Memorandum of Law in Support of filing Motion to Dismiss	\$150	\$135	Mikayla Joyner
5/19/2023	0.2	Updated Motion to Dismiss in preparation for filing with the Court	\$150	\$30	Mikayla Joyner
5/19/2023	0.5	Review select excerpts of Plaintiff's insurance policy effective with Shelter Mutual, excerpts of emails sent from Ms. Plunk to John Price; excerpts from Jason Pirtle's report provided to Shelter following inspection and all documents produced by VCE suggesting/implying independent contractor relationship with Mr. Pirtle; annotate same to outline draft of primary attacks on Plaintiff's Complaint per Federal Rule of Civil Procedure 12(b)(6)	\$400	\$200	Matthew Harris
5/19/2023	0.9	Finalize research as to evidentiary requirements and pleading standards needed in order to state viable claim for violation of Tennessee Unlawful Insurance Act statutory scheme; case authority addressing immunity standard per statute; case authority addressing practitioner term as pled in complaint	\$400	\$360	Matthew Harris
5/19/2023	4.8	Draft Memorandum of Law supporting dismissal of claims based on Plaintiff's failure to state a claim upon which relief can be granted regarding specific inclusion of procedural background, factual allegations set forth in Complaint, legal standard applicable to court's review of motion, basis for Plaintiff's failure to state viable claim for breach of contract, punitive damages, violation of Tenn. Unlawful Insurance Practice Act, and inapplicability of Appraisal/Umpire request	\$400	\$1920	Matthew Harris

EXHIBIT A-1

5/19/2023	0.8	Draft Motion to Dismiss sketching basis for motion, underlying law substantiating motion, outline for memorandum of law filed in support of same, outline of Plaintiff's exhibits referenced in same	\$400	\$320	Matthew Harris
5/17/2023	1	Annotate select excerpts from VCE's report file on Plunk investigation, Jason Pirtle file notes and materials relied upon when formulating opinions/conclusions; annotate photographic findings with report final conclusions and allegations set forth in Complaint regarding preparation to draft Motion to Dismiss and Memorandum of Law Supporting Motion to Dismiss & Recovery of Attorney's Fees	\$400	\$400	Matthew Harris
5/23/2023	0.1	Finalized VCE's Corporate Disclosure Statement in preparation for filing with the Court	\$150	\$15	Mikayla Joyner
5/26/2023	0.4	Organized and prepared all pleadings for attorney review	\$150	\$60	Mikayla Joyner
6/2/2023	0.4	Updated correspondence to Nhataly N. Vu [REDACTED]	\$150	\$60	Mikayla Joyner
6/16/2023	0.2	Teleconference with Jake Hutchinson regarding case status [REDACTED]	\$400	\$80	Matthew Harris
6/15/2023	0.2	Review/confirm briefing schedule and local rules regarding court preferences for reply brief and timeline regarding prep for potential rebuttal argument	\$400	\$80	Matthew Harris
6/23/2023	0.3	Conducted research regarding late filed pleadings in W.D. of Tenn.	\$150	\$45	Samantha McCaleb
6/23/2023	0.4	Review Plaintiff's response opposing VCE's Motion to Dismiss along with supporting exhibits	\$400	\$160	Matthew Harris
6/23/2023	1	Research/evaluate case authority and statutes relied upon by Plaintiff in Response Opposing Motion to Dismiss	\$400	\$400	Matthew Harris
6/23/2023	2.1	Draft rebuttal argument addressing immateriality of Plaintiff's response in opposition and solidifying arguments made in VCE's memorandum of law addressing basis for failure to state a claim under Fed. Rule Civil Procedure 12(b)(6)	\$400	\$840	Matthew Harris
6/30/2023	0.1	Corresponded with Jake Hutchison to schedule telephone conference regarding status of case	\$150	\$15	Mikayla Joyner
6/30/2023	1.6	Continue drafting rebuttal tailored narrowly/succinctly to arguments addressed in Plaintiff's response opposing dismissal; inclusion of separate section addressing inapplicability of Tenn. Unlawful Insurance Practices Act per arguments to the contrary raised in Plaintiff's opposing argument	\$400	\$640	Matthew Harris
7/7/2023	0.5	Finalized VCE's Reply Supporting Motion to Dismiss	\$150	\$75	Mikayla Joyner
7/6/2023	2.2	Research additional case authority/regulatory guidance from Western, Middle, Eastern Tenn. federal divisions and Sixth Circuit Court of Appeals; Tenn. Department of Commerce & Insurance re: prep to finalize rebuttal argument	\$400	\$880	Matthew Harris

EXHIBIT A-1

7/6/2023	2.3	Finalize rebuttal argument and supporting exhibits for inclusion into argument opposing Plaintiff's position regarding applicability of Tennessee Unlawful Insurance Practice Act	\$400	\$920	Matthew Harris
8/16/2023	0.4	Review notes from most previous correspondence with VCE; summary of party positions responsive to pending dispositive motion in preparation for status conference with VCE	\$400	\$160	Matthew Harris
8/23/2023	0.4	Teleconference with Brendon Holbrook as counsel for Jason Pirtle	\$400	\$160	Matthew Harris
8/23/2023	0.3	Teleconference with VCE regarding case update, [REDACTED]	\$400	\$120	Matthew Harris
9/25/2023	1.2	Reviewed file and worked on defense plan and updates to Jake and Ted	\$475	\$570	Thomas Shumate
9/26/2023	0.5	Continued reviewing the original Complaint and working on defense strategy	\$475	\$237.5	Thomas Shumate
9/28/2023	0.2	Continued drafting update to VCE regarding the status of the litigation	\$475	\$95	Thomas Shumate
9/28/2023	0.2	Continued drafting update on the status of the case for Mr. Turner	\$475	\$95	Thomas Shumate
10/4/2023	0.1	Responded to correspondence from Jason Ferrell regarding his Motion to Withdraw	\$475	\$47.5	Thomas Shumate
10/5/2023	0.1	Reviewed Motion to Withdraw by John Price	\$475	\$47.5	Thomas Shumate
10/20/2023	0.2	Reviewed Order Granting Motion to Dismiss	\$475	\$95	Thomas Shumate
10/20/2023	0.1	Drafted status update to Mr. Hutchinson at VCE	\$475	\$47.5	Thomas Shumate
10/20/2023	0.2	Drafted status report to Ted Turner	\$475	\$95	Thomas Shumate
10/20/2023	0.1	Reviewed response from Jake regarding the dismissal of VCE	\$475	\$47.5	Thomas Shumate
10/23/2023	0.1	Telephone conference with Jake Hutchinson regarding Motion for Fees	\$475	\$47.5	Thomas Shumate
10/24/2023	0.2	Tried calling Ted Turner again; drafted correspondence to him regarding the issues we need to discuss [REDACTED]	\$475	\$95	Thomas Shumate
10/24/2023	0.2	Telephone conference with Ted regarding the Order's reference to fee motion and his approval of the same	\$475	\$95	Thomas Shumate
10/25/2023	0.2	Tried to determine whether Ms. Plunk is judgment proof before moving for fees	\$150	\$30	Sydney Brumbach
10/25/2023	0.1	Reviewed Order dismissing Defendant Pirtle for being fraudulently joined	\$475	\$47.5	Thomas Shumate
10/25/2023	0.1	Worked on calculating recoverable attorney's fees	\$350	\$35	Eric Lyons
10/25/2023	0.9	Reviewed Order Granting Motion to Dismiss and our Motion itself in preparation for filing motion seeking attorneys' fees; researched procedural requirements for filing same; researched caselaw applying T.C.A. 56-53-110; reviewed Federal Rule 54 (d)(2) and Local Rule 54.1 regarding deadline for filing and the procedural requirements	\$375	\$337.5	Tanner Gibson

EXHIBIT A-1

10/26/2023	1.7	Began drafting Motion Seeking Attorney Fees in preparation for filing by next week's deadline; reviewed Complaint, MTD, Memo of Law, their Response, our Reply, and the Court's Order; reviewed case law on support needed for a Motion for Attorney Fees	\$375	\$637.5	Tanner Gibson
10/26/2023	0.2	Worked on the Motion for Fees	\$150	\$30	Mikayla Joyner
10/26/2023	0.3	Created billing entries spreadsheet in preparation for submitting along with our Motion for Attorney Fees	\$375	\$112.5	Tanner Gibson
10/27/2023	0.7	Continued research into routes for recovering attorney fees; drafted strategy in preparation for submitting Motion for Attorney Fees	\$375	\$262.5	Tanner Gibson
10/29/2023	1.4	Reviewed the Unlawful Insurance Act, Complaint, Motion to Dismiss, and Order granting same and worked on VCE's Motion for Attorney's Fees	\$475	\$665	Thomas Shumate
10/29/2023	1.1	Continued drafting Motion and Memorandum for Attorneys' Fees	\$375	\$412.5	Tanner Gibson
10/9/2023	0.2	Continued working on fee award calculation	\$350	\$70	Eric Lyons
11/1/2023	1.2	Continued drafting Memorandum of Law in Support of VCE's Motion for Attorneys' Fees	\$375	\$450	Tanner Gibson
11/2/2023	3	Continued drafting Motion and Memorandum of Law on sources of authority supporting our motion for attorney fees award, on plaintiff's counsel's conduct, and on the federal court standard used in determining reasonableness of attorney fees	\$375	\$1125	Tanner Gibson
11/2/2023	0.1	Reviewed correspondence with attorney in West Tennessee who could potentially draft our needed affidavit supporting reasonableness of our attorney fee request	\$375	\$37.5	Tanner Gibson
11/2/2023	0.3	Drafted correspondence to Jonathan S. regarding a fee affidavit and worked on identifying other fee experts	\$475	\$142.5	Thomas Shumate
11/2/2023	0.4	Continued drafting Motion for fees and Memorandum	\$475	\$190	Thomas Shumate
11/3/2023	0.1	Continued working on fee motion	\$475	\$47.5	Thomas Shumate
11/3/2023	1.2	Drafted updates and revisions to our Motion and Memorandum for attorney fees	\$375	\$450	Tanner Gibson
11/3/2023	0.4	Drafted attorney affidavit in support of our motion for award of fees	\$375	\$150	Tanner Gibson
11/3/2023	0.2	Continued drafting Affidavit of Nathan Pride	\$475	\$95	Thomas Shumate
11/3/2023	0.4	Continued drafting Fee Affidavit for myself and working on the fee motion	\$475	\$190	Thomas Shumate
11/6/2023	0.1	Reviewed Memorandum Response to the Show Cause Order submitted by Plaintiff's counsel	\$375	\$37.5	Tanner Gibson
11/6/2023	0.2	Corresponded with attorney Nathan Pride's office regarding his Affidavit on reasonableness of our attorney fees, required under local rules	\$375	\$75	Tanner Gibson
11/6/2023	0.2	Reviewed Response to Order to Show Cause	\$475	\$95	Thomas Shumate
11/7/2023	0.3	Reviewed and made reductions to billing entries on our fee spreadsheet in preparation for filing with Motion for Fees	\$375	\$112.5	Tanner Gibson

EXHIBIT A-1

11/7/2023	1.3	Reviewed and redacted fee itemization spreadsheet in preparation for filing with the Court	\$150	\$195	Mikayla Joyner
11/7/2023	0.8	Continued reviewing and redacting the fee itemization spreadsheet	\$475	\$380	Thomas Shumate
11/8/2023	2.5	Continued drafting the Motion, Memorandum, Proposed Order, Certification, and two Affidavits	\$475	\$1,187.50	Thomas Shumate
11/8/2023	0.5	Drafted Proposed Order Granting Motion for Attorneys' Fees	\$150	\$75	Mikayla Joyner
11/8/2023	0.2	Began drafting Certificate of Consultation	\$150	\$30	Mikayla Joyner
11/8/2023	0.2	Updated Affidavit of Nathan Pride	\$150	\$30	Mikayla Joyner
11/8/2023	0.2	Updated Affidavit of Thomas W. Shumate IV	\$150	\$30	Mikayla Joyner
11/8/2023	0.5	Updated Memorandum in Support of Motion for Attorneys' Fees	\$150	\$75	Mikayla Joyner
11/8/2023	0.2	Updated Motion for Attorneys' Fees	\$150	\$30	Mikayla Joyner
11/09/23	0.1	Continued working on the Certification based on the lack of response from Plaintiff's counsel	\$475	\$47.50	Thomas Shumate
11/10/23	0.6	Reviewed and drafted updates to Proposed Order Granting Attorneys' Fee Motion; researched district courts use to determine reasonableness of fees; researched application of Rule 11	\$475	\$225	Tanner Gibson
11/10/23	1	Finalized Motion, Memorandum, Affidavits and calculated total fee amount in preparation for filing with the Court	\$150	\$150	Mikayla Joyner
	Total: 68 hours			Total: \$23,102.5	